Queensland Floods Commission of Inquiry

Addendum To Statement of Russell Keith Cuerel

October 2011

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QUEENSLAND FLOODS COMMISSION OF INQUIRY

ADDENDUM TO STATEMENT OF RUSSELL KEITH CUEREL

I, RUSSELL KEITH CUEREL, of c/- George Street Brisbane in the State of
Queensland, Manager, Infrastructure Management, Office of the Water Supply
Regulator, Department of Environment and Resource Management (DERM),
solemnly and sincerely affirm and declare:-

- 1. I have previously provided two sworn statements both dated 14 September 2011 to the Queensland Floods Commission of Inquiry (the "Commission") in responding to the Commission's Requirement to Provide Information Reference 1679734 and Requirement to Provide Information Reference 1690693.
- 2. Further to my sworn statement dated 14 September 2011 in responding to the Commission's Requirement to Provide Information Reference 1679734 (the "Requirement"), I wish to make the following amendments:
 - a. At paragraph 6(a) of my statement (in response to Item 3 of the Requirement), a document titled "Urban Flooding in Queensland A Review" prepared for the department in 1998 and various discussion papers have been located relevant to the development of the State Flood Risk Management Policy. These documents are attached at attachment RKC-12 and are additional to the documents previously referred to in my statement at RKC-03.
 - b. Further, at paragraph 6(a) of my statement (in response to Item 3 of the Requirement), additional internal departmental correspondence relevant to the development of the State Flood Risk Management Policy have also been located. These documents are attached at attachment **RKC-12** and are additional to the documents previously referred to in my statement at RKC-03.
 - c. At paragraph 7(b) of my statement (in response to Item 4 of the Requirement), various email correspondence had between the department and the then Department of Emergency Services in relation to the Bundaberg City Council's Draft Planning Scheme is attached at attachment **RKC-13**. These documents are additional to correspondence previously referred to in my statement at RKC-05.
 - d. The additional documents referred to in paragraph 2a above attached to this Addendum Statement have been previously provided to the Commission under a previous Requirement for Information dated 20 July 2011 however, whilst preparing to give evidence before the Commission, I realised that these documents were potentially relevant to the Requirement.
 - e. The additional documents referred to in paragraph 2b and 2c above attached to this Addendum Statement were only located by me on or about 3 October 2011 whilst preparing to appear to give evidence before the Commission.

- 3. During my preparation to give evidence before the Commission, I also identified that the attachments provided in my statement to the Commission were incorrectly indexed. For clarification:
 - a. documents referenced in my statement as RKC-02 are provided at index RKC-08;
 - documents referenced in my statement as RKC-03 are provided at index RKC-02;
 - documents referenced in my statement as RKC-04 are provided at index RKC-03;
 - d. documents referenced in my statement as RKC-05 are provided at index RKC-04;
 - e. documents referenced in my statement as RKC-06 are provided at index RKC-05;
 - f. documents referenced in my statement as RKC-07 are provided at index RKC-06;
 - g. documents referenced in my statement as RKC-08 are provided at index RKC-07; and
 - h. documents provided in my statement at RKC-09 are correctly indexed.

I, RUSSELL KEITH CUEREL, make this solemn declaration conscientiously believing the same to be true, and by virtue of the provisions of the *Oaths Act 1867*.

Signe Rùssell Keith Cuerel

Taken and declared before me, at Brisbane this 4th day of October 2011.

Solicitor/Barrister/Justice of the Peace/Commissioner for Declarations

Note

The attachments to this document have not been uploaded as the file size is too large.